

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

REMCODA, LLC,

Plaintiff,

v.

RIDGE HILL TRADING (PTY) LTD,  
ATARAXIA CAPITAL PARTNERS PTY LTD,  
DE RAJ GROUP AG, PETRICHOR CAPITAL  
SDN BHD, PETRICHOR CAPITAL TRADING  
LIMITED, VAIDYANATHAN MULANDRAM  
NATESHAN, GAYATHRI VAIDYANATHAN,  
MENUSHA GUNAWARDHANA, VINCENT  
FLETCHER, AND RUSSELL GROSS,

Defendants.

Civil Action No. 1:21-cv-00979-ER

**DEFENDANTS PETRICHOR CAPITAL SDN BHD,  
PETRICHOR CAPITAL TRADING LIMITED,  
VAIDYANATHAN MULANDRAM NATESHAN,  
AND GAYATHRI VAIDYANATHAN'S  
NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), and upon the accompanying Declaration of Vaidyanathan Mulandram Nateshan and exhibits thereto, the accompanying Declaration of Daniel P. Goldberger and exhibits thereto, the accompanying Memorandum of Law, Defendants Petrichor Capital Sdn Bhd, Petrichor Capital Trading Limited, Vaidyanathan Mulandram Nateshan, and Gayathri Vaidyanathan (collectively, the “Petrichor Defendants”) will move this Court, before the Honorable Edgardo Ramos, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square New York, NY 10007, at a date and time to be determined by the Court, for an order dismissing with prejudice the claims against the Petrichor Defendants in Plaintiff Remcoda, LLC’s Amended Complaint.

Dated: August 11, 2021

DORSEY & WHITNEY LLP

By: /s/ Daniel P. Goldberger  
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Mulantram Nateshan, and Gayathri  
Vaidyanathan*